



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

June 7, 2013

Lois Hill
Interdisciplinary Team Lead
Nez Perce-Clearwater National Forest
903 3rd Street
Kamiah, Idaho 83536

Re: EPA Region 10 comments on the Clear Creek Integrated Restoration Project Draft Environmental Impact Statement (EPA Project number 12-4142-AFS).

Dear Ms. Hill:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the proposed Clear Creek Integrated Restoration Project on the Moose Creek Ranger District of the Nez Perce-Clearwater National Forests in Idaho County, Idaho. Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The DEIS analyzes the Forest Service's proposal to implement treatments that would move the proposed project area towards a more heterogeneous landscape and create a more resilient forest. Proposed treatments would restore natural disturbance patterns; improve long-term resistance at the landscape level; reduce fuels; improve watershed conditions; improve elk habitat; improve habitat for early seral species; and maintain structure, function and diversity. The project units would be located within a 43,731 acre project area within the Clear Creek drainage. Approximately 94% of the project area is within the rural Salmon-Clearwater Wildland-Urban Interface.

The DEIS analyzes a no action alternative and three action alternatives. The alternatives include similar silviculture treatments, prescribed fire, road re-construction and culvert replacement. The alternatives vary by acres proposed for commercial thinning, regeneration harvest, and miles of new temporary road construction. Alternative B (Proposed Action) was developed by the Interdisciplinary Team with public input and includes 5,606 acres of commercial thinning, 2,609 acres of regeneration harvest and 27.6 miles of new temporary road construction. Alternative C was developed to maximize regeneration harvest (4,156 acres) while Alternative D focuses on minimizing temporary road construction (8.8 miles).

The Clear Creek Project was selected as part of a priority project under the Collaborative Forest Landscape Restoration Program in 2010. The EPA is supportive of the Forest's collaborative effort to develop actions that would improve the historic range of variability on the landscape. The DEIS is robust and clearly describes information gathered from public scoping efforts and includes a summary of other relevant plans that affect the proposed activities (e.g., PACFISH/INFISH).

We support the activities proposed under Alternative B. Based on our review, we are rating the DEIS as LO (Lack of Objections). We appreciate the time that you and other Forest Service staff provided in discussing details about the project so that we may better understand the proposal. We have some suggestions that could further clarify activities in the document. Our recommendations include the following:

1) Temporary Road Construction

The DEIS includes information on the "prescription watershed" area, road density, road name and proposed activity in Table 3-38 that lists estimated reduction in road density from activities and Appendix B "Clear Creek Road Work." All of the watersheds include road densities above the recommended $<1 \text{ mi/mi}^2$ to achieve a "good" watershed condition. The proposed decommissioning would result in a 16% reduction of roads from riparian habitat conservation areas and reduce densities in RHCAs to 1.0 mi/mi^2 . We support this effort and commend the Forest for the robust ongoing efforts (including past projects) to reduce road density, particularly in RHCAs. However, it is unclear how the proposed activities support the overall goal to reduce road density in the watershed and whether or not there are opportunities to minimize proposed road construction activities (e.g., similar to Alternative D) while still meeting the project purpose. The effects analysis related to roads is included in the Watershed Section, Section 3.8. The effects and cumulative effects are combined for all action alternatives. Therefore, it is unclear how impacts from Alternative D (reduced road construction) differ from the other alternatives. To better illustrate this topic, we recommend including a map of the prescription watershed, harvest treatments, and proposed road activities for each alternative. We also recommend that the EIS include a discussion of how minimizing road construction would reduce potential impacts to the watershed.

2) Smoke Management

The DEIS discusses prescribed fire and references smoke management planning through the Idaho/Montana Airshed Group- a consortium of agencies, tribes, and private organizations who coordinate prescribed burn activities to prevent public health impacts. We are pleased that the Forest is a member of the Airshed Group. We believe that the information generated from the Smoke Management Unit is valuable at preventing health impacts. The DEIS references the Airshed Group; however, the DEIS does not provide details describing the group's work and process to avoid or reduce smoke impacts. We recommend including a summary of this information. This could include a description of the process, type of information generated to inform proposed activities, and examples demonstrating program success.

3) Affected Environment

The DEIS includes Chapter 3, Environmental Consequences. The DEIS does not include a Chapter titled Affected Environment (current conditions). Although initially it appeared to be missing, after review it was clear that the information is discussed in Chapter 3. For clarity, we request that Chapter 3 be relabeled Affected Environment and Environmental Consequences.

We appreciate the opportunity to review and comment on the DEIS. If you have any questions about our review, please contact me at 206-553-1601, or by electronic mail at reichgott.christine@epa.gov. Or you may contact Lynne McWhorter of my staff at 208-378-5757 or by electronic mail at mcwhorter.lynne@epa.gov

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly legible.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.